

U.S. DISTRICT COURT  
DISTRICT OF ALASKA

**RECEIVED**  
MAR 14 2007  
CLERK, U.S. DISTRICT COURT  
ANCHORAGE, A.K.  
3:05-cv-283

Deans et al Anchorage School District, SEA et al.

March 10, 2007

**MOTION TO SUBMITT EVIDENTIAL EXHIBITS SUPPORTING OBJECTION  
TO MOTION MEMORANDUM SUPPORTING MOTION TO DISMISS ALL  
DEFENDANTS.**

**I HERE BY SUBMITT**

**EXHIBIT L -ALLEDGE NON SUBSTANTIATED DECERTIFICATION BY CINDY ANDERSON**

**EXHIBIT M- DUE PROCESS COMPLAINT**

**EXHIBIT SL2 ADMINISTRATIVE COMPLAINT**

**EXHIBIT Q1 ATTORNEY FOR LEA -CONFIRMING PLAINTIFF DUE PROCESS FAPE**

**COMPLAINT FEB AND POST PRIOR WRITTEN NOTICE OCT. 27, 2005**

**EXHIBIT Q2 ATTORNEY FOR LEA ACKNOWLEDGING 6 YEAR OLD IEP OCT 27,2005-**

**CONFLICTING 2007 MOTION OF NO PRE-EXISTING IEP**

**EXHIBIT Q5 NUMBER 4, NOT WILLING TO ENGAGE IN MEDIATION AND INSISTING ON**

**INTERIM 504 INSTEAD OF INTERIM IEP OCT 27, 2005 SAME LETTER ACKNOWLEDGING**

**6 YEAR OLD IEP BUT REFUSING INTERIM IEP**

**EXHIBIT K SEA INVESTIGATION BY DI ANN BROWN. DEC 5, 2005 ANSWER TO EXHIBIT**

**SL2 DATED SEPT 23, 2005 STAY PUT PROVISION MORE THAN 60 DAYS AND STATING**

**SAME ISSUE AS FAPE CALLOUSLY AND CARELESSLY AS IF A PROCEDURAL**

**SAFEGUARD ENFORCEMENT WAS NOT THE RESPONSIBILITY OF THE SEA. AND**

**PRETENDING COMPLAINTS WERE NOT FILED SEPARATELY. HOW DID THE**

**DEFENDANTS ATTORNEY KNOW THAT FAPE WAS THE SUBJECT OF DUE PROCESS**

**COMPLAINT, BUT THE SEA INVESTIGATOR CAN'T DIFFERENTIATE BETWEEN**

**PROCEDUARAL SAFEGUARDS AND FAPE , CONFLICTION AGAIN OR EXTREMELY POOR**

**TRICKERY MEANT TO IMPOSE FUTILITY.IN EXHAUsTION OF ADMINISTRATIVE**

**REMEDIES. IDEA LAW ASSUMES STATES CAN GET IT RIGHT, THIS FLIES IN THE FACE**

**OF THAT ASSUMPTION.**

*Luigi Z. Deans*

Levi's King 2 Dec Blvd # 112  
205 E Diamond  
Anchorage, AK 99513

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AVOIDED MAIL  
**CERTIFIED MAIL™**



7006 2150 0000 9466 4202



0000



99513

U.S. POSTAGE  
\$5.00  
ANCHORAGE, AK  
MAR 13 2007  
PM 11:11  
00035014

UNITED STATES  
DISTRICT COURT

District of Alaska  
Federal Bldg. U.S. Courthouse  
222 W. 7th Ave. # 4  
Anchorage, AK. 99513-7564